

---

## State Water Resources Control Board

December 17, 2019

Mr. Justin Kuehn  
Franklin Fueling Systems  
3760 Marsh Road  
Madison Wisconsin 53718

### **REQUEST BY FRANKLIN FUELING SYSTEMS FOR THE ADDITION OF THE DEFENDER 804 VENT CAP TO EXECUTIVE ORDERS VR-101, VR-102, VR-104, AND VR-105**

On November 5, 2019, the State Water Resources Control Board (State Water Board) received an information packet from Franklin Fueling Systems requesting a review of the Defender 804 pressure/vent cap for addition to Executive Orders (EOs) Vapor Recovery (VR)-101, Phil-Tite Phase I, VR-102 OPW Phase I, VR-104 CNI Manufacturing Phase I, and VR-105, Emco Wheaton Retail Phase I, for Enhanced Vapor Recovery (EVR) Systems.

This notice is to inform you that the State Water Board has no determination to make regarding the proposed modification to EOs VR-101, Phil-Tite Phase I, VR-102 OPW Phase I, VR-104 CNI Manufacturing Phase I, or VR-105, Emco Wheaton Retail Phase I, for EVR Systems.

State Water Board staff have reviewed the submitted materials and concluded that the proposed equipment does not affect the EVR determinations previously issued by the State Water Board for EOs VR-101, Phil-Tite Phase I, VR-102 OPW Phase I, VR-104 CNI Manufacturing Phase I, or VR-105, Emco Wheaton Retail Phase I, for EVR Systems. The proposed equipment submitted for review are aboveground components that are not part of the UST system as regulated by Health and Safety Code, division 20, chapter 6.7, and California Code of Regulations, division 3, chapter 16.

If you have questions regarding this subject, please contact Mr. Tom Henderson at (916) 319-9128 or [Tom.Henderson@waterboards.ca.gov](mailto:Tom.Henderson@waterboards.ca.gov).



Laura S. Fisher, Chief  
UST Leak Prevention Unit &  
Office of Tank Tester Licensing  
State Water Resources Control Board

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

cc: *(via email only)*

Mr. George Lew, Chief  
Engineering and Certification Branch  
Air Resources Board  
[George.Lew@arb.ca.gov](mailto:George.Lew@arb.ca.gov)

Julie M. Osborn, Attorney IV  
Office of Chief Counsel  
State Water Resource Control Board  
[Julie.Osborn@waterboards.ca.gov](mailto:Julie.Osborn@waterboards.ca.gov)